

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION**

UNITED STATES OF AMERICA

v.

PHILLIP DAEKWON MILES,

Defendant.

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Criminal Action No.: 4:18-CR-00011

**NOTICE OF MILES' NON-OPPOSITION TO UNITED STATES' MOTION
REGARDING JURY COMPOSITION, MOTION FOR USE OF A JURY
QUESTIONNAIRE, AND RESPONSE IN OPPOSITION TO UNITED STATES'
MOTION FOR AN ANONYMOUS JURY**

COMES NOW the Defendant, Phillip Daekwon Miles, by counsel, and hereby gives NOTICE of his intent, at the hearing on April 19, 2019, not to oppose the Motion of the United States Regarding Jury Composition, ECF 383.

Defendant Miles, by counsel, further gives NOTICE of his intent, at the hearing on April 19, 2019, to join and adopt the Motion for Use of Jury Questionnaire filed by his co-defendant, Marcus Davis, ECF 388.

Finally, Defendant Miles requests that the Court deny the United States' Motion for an Anonymous Jury, ECF 385. Defendant Miles joins and adopts the legal arguments presented by his co-defendant Kanas Trent, in his Opposition to United States Motion for Anonymous Jury, ECF 408, and his co-defendant Shabba Chandler, in his Memorandum in Opposition to the United States' Motion for Anonymous Jury, ECF 410. Defendant Miles further suggests that the installation of a Roanoke jury, rather than a Danville jury, as per the Motion Regarding Jury Composition, ECF 383, vitiates the United States' concerns regarding the safety of the jurors, as any jurors will be far removed from the Danville community where the alleged crimes were

perpetrated. By utilizing a jury questionnaire as previously suggested by Marcus Davis, ECF 388, and empaneling a Roanoke jury, but rejecting the use of an anonymous jury, the Court would eliminate the need to restrict Phillip Miles' – and his co-Defendants' – Constitutional rights while also alleviating the United States' concerns otherwise necessitating jury anonymity.

Respectfully submitted,

PHILLIP DAEKWON MILES

By: /s/ M. Tyson Daniel
Of Counsel

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Counsel for Defendant

CERTIFICATE OF SERVICE

I, M. Tyson Daniel, Esq., hereby certify that, on this 12th day of April 2019, I electronically filed the foregoing Combined Notice and Motion with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ M. Tyson Daniel
Counsel for Defendant